

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)
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In re:

High Brass Farm Land Holdings LLC,

Debtor.

Case No.: 19-25217-MBK
Chapter 11
Hearing Date: 12/19/19
Judge Kaplan

APPLICATION FOR ORDER SHORTENING TIME

The applicant Edmond George, Esquire of Obermayer Rebmann Maxwell & Hippel LLP, counsel for the debtor, on behalf of debtor High Brass Farm Land Holdings LLC requests that the time period for a hearing on the debtor's Motion to Extend the Automatic Stay for Cause as required by D.N.J. LBR 9013-2 be shortened pursuant to Fed. R. Bankr. P 9006(c)(1), for the reason(s) set forth below:

1. A shortened time hearing is requested because:

The automatic stay will expire by operation of law in this Single-Asset Real Estate case on December 24, 2019, permitting secured creditors to take actions against the real estate before the debtor will be able to submit a confirmable plan of reorganization to the Court. Extension of the stay for cause under 11 U.S.C. §362(d)(3) must be ordered before the stay expires. As detailed further in the debtor's Motion to Extend Stay for Cause, cause exists to grant the extension of the stay in order to vindicate the Court's order sending the associated Adversary Proceeding to mediation, and because it is in the interest of creditors and the debtor that contested issues be settled before the debtor's sole asset is foreclosed.

2. State the hearing dates requested:

December 19, 2019.

3. Reduction of the time period is not prohibited under Fed. R. Bankr. P 9006(c)(1). The applicant requests entry of the proposed order shortening time.

Date: 12/13/2019

/s/Edmond George
Signature